

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PRAKASH MOHANTY, Individually and on)	Case No. 1:16-cv-12336-IT
Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	
)	CLASS ACTION
vs.)	
)	
AVID TECHNOLOGY, INC., LOUIS)	
HERNANDEZ, JR., and ILAN SIDI,)	
)	
Defendants.)	
)	
)	

**LEAD COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES,
PAYMENT OF EXPENSES, AND AN AWARD TO LEAD PLAINTIFF
PURSUANT TO 15 U.S.C. §78u-4(a)(4)**

Court-appointed Lead Counsel Johnson Fistel, LLP (“Lead Counsel”) hereby moves the Court, pursuant to Federal Rule of Civil Procedure 23 and 54, for an order: (i) awarding attorneys’ fees; (ii) paying litigation expenses incurred in prosecuting the Action;¹ and (iii) for a compensatory award pursuant to 15 U.S.C. §78u-4(a)(4) to Lead Plaintiff.

In support of this motion, Lead Counsel relies on the (1) Stipulation, and all exhibits annexed thereto; (2) Notice Order, and all exhibits annexed thereto; (3) Memorandum of Law in Support of Lead Counsel’s Motion for an Award of Attorneys’ Fees, Payment of Expenses, and an Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (4) Memorandum of Law in Support of Lead Plaintiff’s Motion for Final Approval of Class Action Settlement, Approval of the Plan of Allocation, and Final Certification of the Class for Settlement Purposes; and (5) Declaration of Michael I. Fistel, Jr. in Support of (1) Lead Plaintiff’s Motion for Final Approval of Class Action Settlement, Approval of the Plan of Allocation, and Final Certification of the Class for Settlement Purposes; and (2) Lead Counsel’s Motion for an Award of Attorneys’ Fees, Payment of Expenses, and an Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4), and all exhibits annexed thereto.

A [Proposed] Order Awarding Attorneys’ Fees, Approving Payment of Expenses, and Approving a Compensatory Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4) is submitted herewith. Defendants have indicated that they will not be opposing this Motion.

¹ Unless otherwise defined herein, all capitalized terms used herein are defined in the Stipulation and Agreement of Settlement, dated November 30, 2017 (the “Stipulation”) (Dkt. No. 50-2).

DATED: February 23, 2018

Respectfully submitted,

JOHNSON FISTEL, LLP
MICHAEL I. FISTEL, JR.

s/ Michael I. Fistel, Jr.

MICHAEL I. FISTEL, JR.

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Liaison Counsel for Lead Plaintiff

CERTIFICATE OF COMPLAINT WITH LOCAL RULE 7.1(a)(2)

I hereby certify that counsel for the parties have conferred in a good faith and attempted to resolve or narrow the issues described in this motion, and counsel for defendants indicated that defendants will not be opposing this motion.

s/ Michael I. Fistel, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 23, 2018.

s/ Michael I. Fistel, Jr.

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